

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : **CHAPTER 13**
: :
Stephanie Dudley, : **BANKRUPTCY NO. 17-12488**
: :
Debtor. : :
: :
: :

KARELL TURNER AND SHAKEEMA TURNER'S
MOTION FOR EXTENSION OF TIME TO OBJECT TO DISCHARGE
AND TO DETERMINE DISCHARGEABILITY OF DEBT UNDER § 523(c)

Karell Turner and Shakeema Turner, by and through their attorney, Jennifer Schultz, Esquire, hereby request an extension of time to object to discharge, pursuant to Bankruptcy Rule 4004 and 4007:

1. Movants are Karell Turner and Shakeema Turner.
 2. Movants reside at 5627 Miriam Road in Philadelphia, PA 19124. Shakeema Turner and Karell Turner are equitable owners of the property by virtue of an installment sales contract that was entered into with Debtor on December 3, 2016. A true and correct copy of the contract is attached hereto as Exhibit A. See also *McCannon v. Marston*, 679 F.2d 13, 15 (3rd Cir. 1982) (“The law of Pennsylvania considers a purchaser under a written agreement for the sale of real property to be an equitable owner of that property.”)
 3. Pursuant to the Court’s order of October 24, 2017, (Doc 47), the deadline to object to dischargeability of a debt under § 523(c) and to object to discharge is December 1, 2017.
 4. Mr. and Mrs. Turner assert they have legal bases to challenge the discharge for Debtor in the present case and they have legal bases under § 523(c) to challenge the dischargeability of the debts owed to them by Debtor.

5. Mr. and Mrs. Turner have reached a settlement in principle with Debtor which would obviate the need to challenge discharge in general or dischargeability of their debts in particular.

6. The Turners' counsel and Debtor's counsel are working to finalize the settlement to present it to the Court for approval.

7. In the interest of judicial economy, the Turners request the Court extend the deadline to initiate an adversary proceeding to object to discharge, as permitted in Rule 4004(b), until January 31, 2018.

8. In the interest of judicial economy, the Turners request the Court extend the deadline to initiate an adversary proceeding to determine dischargeability under § 523(c), as permitted in Rule 4007(c) until January 31, 2018.

WHEREFORE, Karella Turner and Shakeema Turner respectfully request that this Honorable Court enter an Order extending the time to object to discharge and to determine dischargeability of their debts under § 523(c) until January 31, 2018.

December 1, 2017
Date

/s/ Jennifer Schultz
Jennifer Schultz, Esquire
Attorney for Shakeema Turner and Karella Turner
Community Legal Services
1410 W. Erie Ave.
Philadelphia, PA 19140

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IN RE: : **CHAPTER 13**
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Stephanie Dudley, :
: **Debtor.** :
: _____

ORDER

NOW, this _____ day of _____, 2017, upon consideration of
Karell Turner and Shakeema Turner's Motion for Extension of Time to Object to Discharge and
to Determine Dischargeability of Debt Under § 523(c) and all responses thereto, it is hereby
ORDERED and DECREED that the motion is GRANTED.

The deadline to object to discharge or to determine dischargeability of debt under
§ 523(c) is extended until January 31, 2018, for Karell Turner and Shakeema Turner. The parties
may seek additional time for cause shown.

Ashely M. Chan
United States Bankruptcy Judge

Parties to be served:

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